

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

JOHN MATTHEW COOK, ELLYSMAR  
GÓMEZ-LUZARDO,

Plaintiffs,

v.

F. GERARDO LARREA-OLOZAGA, JUAN A.  
LARREA-FRENCH, CARIBBEAN GLAZE  
CORPORATION, GLAZE ON INVESTMENT,  
INC., LUIS ARENAS, ALEJANDRO D. CERDA,  
IVELISSE BORRERO DE CORDOVÉS,  
ARTURO FERNÁNDEZ, FELIPE FLORES-  
ROLÓN, FRANCISCO GERARDO LARREA-  
FRENCH, MARÍA LARREA-FRENCH,  
GILBERTO MARXUACH, JACOBO ORTIZ  
MURIAS, ANICETO SOLARES-RIVERO Y  
FERNANDO L. TORO,

Defendants.

Civil No.: 14-cv-01544 (CCC)

RE: purported federal securities fraud,  
breach of fiduciary duties, declaratory  
judgment, derivative and direct action

**MOTION IN COMPLIANCE WITH ORDERS**

TO THE HONORABLE COURT:

Co-defendants, Gerardo Larrea-Olozaga and Juan A. Larrea-French, through undersigned counsel, respectfully state and request as follows:

1. On October 22 and 23, 2014, the Court ordered co-defendants Larrea-Olozaga and Larrea-French to submit: (1) the Motion for Reconsideration and/or Relief from Judgment filed on May 27, 2014 in Civil No. K PE2013-5152 (904); (2) the Order resetting the September 4, 2014 hearing for October 23, 2014 in Civil No. K PE2013-5152 (904); and (3) the Counterclaim filed by Larrea-Olozaga and Larrea-French in Civil No. K PE2013-5152 (904).

*Dockets No. 40 and 45.*

2. In compliance with the Orders issued by the Court, the appearing co-defendants submit the following certified English translations of the state court documents requested:

**Exhibit A** - Counterclaim<sup>1</sup> filed by Larrea-Olozaga and Larrea-French on December 2, 2014 in Civil No. K PE2013-5152 (904).

**Exhibit B** - Motion for Reconsideration and/or Relief from Judgment filed by Larrea-Olozaga and Larrea-French on May 27, 2014 in Civil No. KPE2013-5152 (904).

**Exhibit C** - Exhibit A of Motion for Reconsideration and/or Relief from Judgment.

**Exhibit D** - Order setting oral argument for September 4, 2014 and listing motions to be addressed issued in Civil No. KPE2013-5152(904).

**Exhibit E** - Order resetting oral argument for October 23, 2014 issued in Civil No. KPE2013-5152(904).

3. The Counterclaim filed at the San Juan Court includes 15 exhibits that, because of their volume and short amount of time given for the translations, are not included with the certified English translation of the Counterclaim submitted today. The appearing co-defendants request until October 31, 2014 to file certified English translations of the exhibits.

WHEREFORE, Larrea-Olozaga and Larrea-French request that the Honorable Court take notice of the above and grant them until October 31, 2014 to file certified English translations of the exhibits of the Counterclaim.

Respectfully submitted.

In San Juan, Puerto Rico, this 27th day of October, 2014.

CERTIFICATION: An electronic copy of the foregoing was filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

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<sup>1</sup> A certified English translation of page 47 of the Counterclaim was included by Plaintiffs' in Docket No. 6-3.

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/s/Natalia Morales-Echeverría

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